

MIRIAM TAUBER LAW
 885 Park Ave. #2A • New York NY 10075
 MiriamTauberLaw@gmail.com • (323) 790-4881

February 12, 2024

Via ECF

Hon. Denise L. Cote (S.D.N.Y.)

Granted.
2/12/2024

**Re: *Avalon Holdings Corp. v. Gentile et. al., No. 18-cv-7291;*
*& New Concept Energy, Inc. v. Gentile, et. al., No. 18-cv-8896***



Request for Extension of Deadline to File
Plaintiffs' Application for Attorney's Fees and Pre-Judgment Interest

Your Honor:

The Court's Order adopting Magistrate Judge Lehrburger's Report & Recommendation (subject to the revisions requested by Plaintiffs) permitted Plaintiffs to apply for attorneys' fees and directed Plaintiffs to submit revised pre-judgment calculations in connection with the Court's award of prejudgment interest to the Plaintiffs. (*See* *Avalon* Dkt. 274, 275; *New Concept* Dkt. 258, 259.)

Plaintiffs' Application is currently due on February 16, 2024. Plaintiffs respectfully request a 1-week extension, or until February 23, 2024, with the Opposition and Reply deadlines similarly extended. Current and proposed extended deadlines are provided below for reference:

<u>Submission</u>	<u>Current deadline</u>	<u>Proposed</u> <u>Extended deadline</u>
Plaintiffs' Application for Award of Attorneys' Fees & Pre-Judgment Interest	February 16, 2024	February 23, 2024
Gentile's Opposition	March 1, 2024	March 8, 2024
Plaintiffs' Reply	March 8, 2024	March 15, 2024

Gentile does not oppose this request.

Respectfully,

/s/ Miriam Tauber
 Miriam Tauber
Attorney for Plaintiffs

cc: All counsel (via ECF)